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Investment Corporation Limited
and Proposed Lead Counsel for the Class*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE TESLA INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

Judge: Hon. Edward M. Chen
Date: N/A
Time: N/A
Courtroom: Courtroom 5 – 17th Floor

**DECLARATION OF RAMZI ABADOU IN SUPPORT OF BRIDGESTONE INVESTMENT
CORPORATION LIMITED’S REPLY IN SUPPORT OF ITS MOTION FOR
RECONSIDERATION OF NOVEMBER 27, 2018 ORDER**

I, Ramzi Abadou, hereby declare as follows:

1. I am a member in good standing of the bar of the State of California and am admitted to this District.

2. I submit this Declaration, together with the attached exhibits, in support of Bridgestone Investment Corporation Limited's Reply in Support of Its Motion for Reconsideration of November 27, 2018 Order. I am fully familiar with the facts stated herein.

3. Attached hereto as "Exhibit A" is a true and correct copy of the "Order (1) Scheduling Hearing on Motions to Appoint Lead Plaintiff, (2) Requesting Information from Lead Plaintiff Candidates, and (3) Setting Briefing Schedule" from *Evellard v. LendingClub Corporation*, Case No. 3:16-cv-02627-WHA, ECF No. 16 (N.D. Cal. June 15, 2016).

4. Attached hereto as "Exhibit B" is a true and correct copy of a report published by *Morningstar Equity Research* on August 7, 2018 titled "Musk Tweets Tesla May Go Private at \$420 a Share but Stockholders May Not Have to Sell at That Price."

5. Attached hereto as "Exhibit C" is a true and correct copy of a report published by *Berenberg* on August 8, 2018 titled "Private Tesla to Send Ripples Across Industry."

6. Attached hereto as "Exhibit D" is a true and correct copy of an article published on *TheStreet.com* dated August 10, 2018, titled "Tesla Could Get Bid Above \$420 as Board Looks at Take-Private Plan."

7. Attached hereto as "Exhibit E" is a true and correct copy of an article published on *MarketWatch.com* dated August 8, 2018, titled "Call of the Day: Tesla shares are headed for \$420 regardless."

8. Attached hereto as "Exhibit F" is a true and correct copy of the "Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses" from *In re Vocera Communications, Inc. Securities Litigation*, Case No. 3-13-cv-03657-EMC, ECF No. 203-4 (N.D. Cal. May 19, 2016).

9. Attached hereto as "Exhibit G" is a true and correct copy of the "Notice of Pendency

DECLARATION OF RAMZI ABADOU IN SUPPORT OF BRIDGESTONE INVESTMENT CORPORATION LIMITED'S REPLY IN SUPPORT OF ITS MOTION FOR RECONSIDERATION OF NOVEMBER 27, 2018 ORDER

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of Class Action, Proposed Settlement, and Motion for Attorneys’ Fees and Expenses” from *In re PTC Therapeutics, Inc. Securities Litigation*, Case No. 16-cv-1224 (KM)(MAH), ECF No. 93-3 (D.N.J. Aug. 3, 2018).

10. Attached hereto as “Exhibit H” is a true and correct copy of the “Notice of Proposed Class Action Settlement” from *Ford v. Natural Health Trends Corp. et al.*, Case No. 2:16-cv-00255-TJH-AFM, ECF No. 105-1 (C.D. Cal. Feb. 26, 2018).

11. Attached hereto as “Exhibit I” is a true and correct copy of the “Notice of Pendency of Class Action and Proposed Settlement, Settlement Hearing, and Motion for Award of Attorneys’ Fees and Reimbursement of Litigation Expenses” from *Bai v. TCP International Holdings, Ltd., et al.*, Case No. 1:16-cv-00102, ECF No. 81-1 (N.D. Ohio Dec. 22, 2017).

12. Attached hereto as “Exhibit J” is a true and correct copy of an article published on *Fortune.com* dated August 18, 2018 titled, “Tesla Short-Sellers Made More Than \$1 Billion from CEO Elon Musk’s Troubling New York Times Interview.”

I declare under the penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on Wednesday, December 12, 2018, in New York City, New York.

/s/ Ramzi Abadou
RAMZI ABADOU